

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ARM LTD.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 22-1146 (MN) (LDH)
)	
QUALCOMM INC., QUALCOMM)	
TECHNOLOGIES, INC. and NUVIA, INC.,)	
)	
Defendants.)	

[PROPOSED] ORDER GRANTING DEFENDANTS' MOTION TO COMPEL

The Court having considered the parties' letter briefs, the arguments and authorities of counsel, and any oral argument;

NOW, THEREFORE, IT IS HEREBY ORDERED that Defendants' motion to compel is GRANTED, as follows:

(1) ARM shall produce all ARM ALAs and annexes thereto, without any date limitation, in unredacted form;

(2) ARM shall collect Masayoshi Son's custodial files and meet and confer with Defendants in good faith to reach agreement on the appropriate search terms to be applied;

(3) ARM shall run Defendants' two proposed additional search terms concerning ARM's IPO and conduct targeted searches of ARM employees or representatives that it identifies as having relevant knowledge concerning ARM's IPO as it relates to this litigation; and

(4) ARM shall meet and confer in good faith with Defendants concerning any outstanding questions Defendants may have concerning the scope of documents collected and produced from Antonio Viana's custodial files.

IT IS SO ORDERED this ____ day of _____, 2023

The Honorable Laura D. Hatcher